

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

VICTOR BROOKS,)
)
 Plaintiff,)
)
 v.) No. 08 CV 2417
)
 LISA MADIGAN, *et al.*;)
)
 Defendants.)
)
)

DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD

Defendants Lisa Madigan, Joseph Ponsetto, Edward C. Carter, III, Mark Ross, Jorge Montes, and Kenneth Tupy, by their attorney, Lisa Madigan, Attorney General of Illinois, respectfully move this Court for an extension of time of 28 days from May 5, 2008, until June 2, 2008, in which to answer or otherwise plead to Plaintiff's Complaint. In support of this motion, the Defendants state as follows:

1. On March 18, 2008, the Plaintiff filed his Complaint in the Circuit Court of Cook County. On information and belief, Defendants Kenneth Tupy, Norman Sula, and Jorge Montes were served on or about March 28, 2008. Defendants Madigan, Carter, and Ponsetto were served on or about April 1, 2008.
2. The Defendants timely removed this action to federal court on April 28, 2008.
3. Counsel for the Defendants require additional time to fairly and completely investigate the allegations of the Complaint and prepare an appropriate response. The Defendants respectfully request the Court extend the time to answer or otherwise plead until June 2, 2008 – 28

days from May 5, 2008.

4. Counsel for the Defendants conferred with Plaintiff's counsel on May 2, 2008 via telephone. Plaintiff's counsel stated he has no objection to the granting of this motion. Moreover, the granting of this motion will not prejudice any party and the presentment of this motion is not interposed for delay.

WHEREFORE, the Defendants requests that this motion be granted, and that the Defendants be granted until June 2, 2008, in which to answer or otherwise plead to the Complaint.

Respectfully submitted,

May 2, 2008

LISA MADIGAN
Attorney General of Illinois

/s/ Ronald A. Rascia
RONALD A. RASCIA
KATHLEEN FORD
ALLAN ABINOJA
MARK W. BINA
Assistant Attorneys General
100 West Randolph Street
Chicago, Illinois 60601
(312) 814-3000

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Unopposed Motion for Extension of Time to Answer or Otherwise Plead was served this 2d day of May, 2008 by electronic filing pursuant to Rule XI of the General Order On Electronic Case Filing.

/s/ Ronald Rascia